

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

RYAN C. HENRY

Civil Action No. 04-CV-40346

Plaintiffs,

Hon. Stephen J. Murphy, III

v.

QUICKEN LOANS INC.,

Defendant.

DEFENDANT, QUICKEN LOANS INC.'S, REQUESTED ADDITIONAL VOIR DIRE

Defendant, Quicken Loans Inc. (“Quicken Loans”), by and through its attorneys, requests additional *voir dire* beyond the standard *voir dire* that this Honorable Court will conduct. Quicken Loans hereby submits the following requested additional *voir dire* questions pursuant to this Court’s October 5, 2010 Final Amended Scheduling Order:

1. Have you or any of your family members worked for, owned or provided any services in the mortgage industry or in the real estate industry in any capacity?
 1. If so, what was the nature and/or circumstances of such involvement?
 2. If so, would the experience affect your ability to be impartial in this case?
2. Do you know anyone who has worked at Quicken Loans or Rock Financial, or applied for or obtained a mortgage loan from Quicken Loans?
 1. If so, who?
 2. If so, what is your relationship with each such person?
 3. If so, could you still be impartial in this matter?
3. Have you, your spouse or any member of your immediate family ever held a job position that paid you as a salaried employee?
 1. If so, what job position(s)?
 2. If so, how exactly was that person paid?
 3. If so, what reaction, if any, did you or your spouse or family member have to receiving compensation on a salaried basis?

4. Have you, your spouse or any member of your immediate family ever held a job position as an hourly employee with overtime?
 1. If so, what job position(s)?
 2. If so, how exactly was that person paid?
 3. If so, what reaction, if any, did you or your spouse or your family member have to receiving compensation on a hourly basis with overtime?

5. Have you, your spouse or any member of your immediate family held a job position where you were paid commissions as all or part of your compensation?
 1. If so, what job position(s)?
 2. If so, how exactly was that person paid?
 3. If so, what reaction, if any, did you or your spouse or your family member have to receiving compensation on a commission basis?

6. Have you, your spouse or any member of your immediate family ever been employed in a job position that required you to work more than 40 hours a week?
 1. If so, were you salaried or hourly?
 2. If so, what was the type of job and job position?
 3. If so, what reaction, if any, did you or your spouse or your family member have to being required to work more than 40 hours.

7. Are you aware that there are some jobs where people work more than 40 hours per week and

are not entitled to overtime because they are salaried employees and are exempt from overtime?

8. Have you or your spouse ever applied for a mortgage loan in connection with purchasing a new home or refinancing an existing home?
 1. If so, what experiences have you had in dealing with a mortgage company?
 2. If so, when did you have such experiences?
9. Have you or your spouse had any experience dealing with a mortgage banker or loan officer?
 1. If so, what experiences have you had?
 2. If so, when did you have such experiences?
10. Do you have any feelings about mortgage companies or the mortgage industry in general?
 1. If so, what are those feelings?
 2. Are such feelings based upon your own experiences, or what you may have heard in the news or from other people?
 3. If so, why did you have such feelings?
11. Have you ever been involved in any dispute with an employer over salary or compensation?
 1. If so, explain.
 2. If so, when did you have such a dispute?

12. Have you ever been fired, laid off or down-sized from a job?
 1. If so, explain.
 2. If so, when?

13. Have you ever left a job because of the way you were treated by a supervisor or employer?
 1. If so, explain.
 2. If so, when?

14. Have you ever sued or considered suing an employer or former employer?
 1. If so, explain.
 2. If so, when?

15. Have you, your spouse or any member of your immediate family ever owned your own business or been self-employed?
 1. If so, when?
 2. If so, nature of business.
 3. If so, what happened to that business?
 4. If so, how were the employees of that business paid – salary, hourly or commission?

16. Have you, your spouse or any member of your immediate family ever held a job which you consider to be a sales position?
 1. If so, what position was the job?

2. If so, for what employer?
17. Have you, your spouse or any member of your immediate family ever been a member or part of a union?
 1. If so, what union?
 2. If so, when?
18. Have you ever heard of Daniel Gilbert?
 1. If so, how have you heard of Mr. Gilbert?
 2. If so, do you have any opinion about Mr. Gilbert?
 3. If so, what is your opinion of Mr. Gilbert?
19. This is a lawsuit where former employees are claiming that they should have been paid overtime by their employer, Quicken Loans, which is a large mortgage lender. Before you hear any of the facts in this case or the laws that apply, in your heart, would you tend to be slightly in favor of Quicken Loans, would you tend to be slightly in favor of the employees, or, in your heart, do you not in the slightest favor either party even a little?
20. Do you understand that just because the Plaintiffs have claimed that they should be paid overtime does not mean that they are entitled to be paid overtime – Plaintiffs have the burden of proving at trial that they were entitled to overtime?

Respectfully submitted,

/s/ Jeffrey B. Morganroth
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